

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 4/8/2019 8:05:50 AM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]
CC: Beck, Nancy [Beck.Nancy@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]
Subject: Re: Letter from AAPCO BOD: Concerns regarding the notification: Guidance on FIFRA 24(c) Registrations

Thanks Rick. These are the types of comments I expect our process on the guidance would elicit. They do not mention the legal framework of FIFRA. Please keep OGC looped in.

In terms of making a draft guidance update available to the public I know we were talking June/July.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC

Sent from my iPhone

On Apr 4, 2019, at 12:41 PM, Keigwin, Richard <Keigwin.Richard@epa.gov> wrote:

FYI. We will be working on a response.

I am meeting with AAPCO leadership when they are in town next week.

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

Begin forwarded message:

From: Rose Kachadoorian <rkachadoorian@oda.state.or.us>
Date: April 4, 2019 at 10:20:36 AM EDT
To: "Keigwin, Richard" <Keigwin.Richard@epa.gov>
Cc: Leo Reed <reedla@purdue.edu>, Derrick Lastinger <derrick.lastinger@agr.georgia.gov>, "Jones, Patrick" <patrick.jones@ncagr.gov>, Cary Giguere <Cary.Giguere@vermont.gov>, Megan Patterson <Megan.L.Patterson@maine.gov>, Liza Fleeson <Liza.Fleeson@vdacs.virginia.gov>, "tdrake@clemson.edu" <tdrake@clemson.edu>, "GBahr@agr.wa.gov" <GBahr@agr.wa.gov>, Jeffrey Rogers <jeffrey.rogers@vdacs.virginia.gov>, Amy Sullivan <aapco.sfireg@gmail.com>

**Subject: Letter from AAPCO BOD: Concerns regarding the notification:
Guidance on FIFRA 24(c) Registrations**

Rick,

Attached is a letter provided to the US EPA by the AAPCO Board of Directors (BOD), on behalf of the members of AAPCO.

This letter concerns the notification posted on the Guidance on FIFRA 24(c) Registrations website on 03/19/19. According to the notification, EPA is now re-evaluating its approach to reviewing 24(c) requests and the circumstances under which it will exercise its authority to disapprove those requests.

The AAPCO BODs considers the Section 24(c) process to be currently highly functional, and protective of non-target plants and the environment.

We look forward to working with our EPA partners on this very important issue.

Sincerely,

Rose Kachadoorian
AAPCO President
Pesticides Program Manager,
Registration, Licensing and Certification
Natural Resource Policy Area
Oregon Department of Agriculture
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<AAPCO 24(c) Letter Final April 4 2019.pdf>